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## UNITED STATES DISTRICT COURT

#### DISTRICT OF OREGON

### **EUGENE DIVISION**

ST. CHARLES HEALTH SYSTEM, INC., an Oregon nonprofit corporation,

Plaintiff,

v.

OREGON FEDERATION OF NURSES AND HEALTH PROFESSIONALS, LOCAL 5017, AFT, AFL-CIO,

Defendant.

Case No. 6:21-cv-00304-MC

ST. CHARLES HEALTH SYSTEM, INC., DAVIS WRIGHT TREMAINE LLP AND MARK HUTCHESON'S JOINT AND UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME

## LR 7-1 CERTIFICATE OF COUNSEL

Counsel for Davis Wright Tremaine LLP and Mark Hutcheson (collectively "DWT parties") and St. Charles Health System, Inc. ("St. Charles") certify that they conferred with counsel for Defendant, who does not oppose this motion.

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### **MOTION**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), DWT parties and St. Charles respectfully move this Court to issue an Order extending the deadline by which the DWT parties and St. Charles are required to file a responsive pleading to the Motion for Imposition of Sanctions (Dkt. 20) and the Court's Order to Show Cause (Dkt. 24). The current deadline to respond to both the Motion for Imposition of Sanctions and the Court's Order to Show Cause is May 12, 2021. DWT parties and St. Charles respectfully request an additional week (or until May 19, 2021) to prepare responses to the order and motion.

The DWT parties and St. Charles request this extension as counsel need additional time to investigate the issues before the Court and respond to them and to pursue a possible settlement with Defendant.

Defendant does not oppose this motion. This motion is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion. This is the second request for an extension of time filed in this matter.

DATED this 7th day of May, 2021.

**HOLLAND & KNIGHT LLP** 

SHEPPARD MULLIN RICHTER & HAMPTON LLP

By: s/ Peter R. Jarvis

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